

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT DIVISION

MORRIS & DICKSON CO., LLC

CIVIL ACTION NO. 18-cv-00605

v.

JUDGE ELIZABETH E. FOOTE

JEFFERSON B. SESSIONS, III, ET AL

MAGISTRATE JUDGE HORNSBY

**MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Morris & Dickson Co., LLC (“Morris & Dickson”) hereby moves for a preliminary injunction (1) prohibiting Defendants, Jefferson B. Sessions, III, the Attorney General of the United States, the United States Department of Justice, Robert W. Patterson, the Acting Administration of the Drug Enforcement Administration (the “DEA”), the DEA (collectively, “Defendants”), or anyone acting on their behalf from enforcing the Order to Show Cause and Immediate Suspension of Registration executed on May 2, 2018 (the “ISO”), which purports to immediately suspend DEA Certificates of Registration Nos. RM0314790 and RM0335732 (the “Registrations”); (2) compelling the immediate return and continued provision of any registrations, licenses, or forms required prevent the enforcement of the ISO; and (3) maintaining the status quo pending the conclusion of this case on the merits.

As set forth more fully in the memorandum in support of this motion, a preliminary injunction is appropriate for the following non-exclusive reasons:

1. There is a substantial likelihood that Morris & Dickson will succeed on the merits of its claims that the ISO was unlawful and violated both federal law and Morris & Dickson’s due process rights.
2. Morris & Dickson and its customers will suffer irreparable harm if the requested preliminary injunction is not issued and the company’s shipments of vital medicines

containing controlled substances are disrupted.

3. The harm Morris & Dickson would suffer as a result of the denial of the injunction far outweighs the harm, if any, Defendants would suffer if the injunction is granted.
4. The public interest will be harmed if the preliminary injunction is not granted.

WHEREFORE, Morris & Dickson prays that this Court issue all process necessary and appropriate to:

- (1) prohibit Defendants from enforcing the ISO;
- (2) maintain the status quo pending the conclusion of this case on the merits;
- (3) compel Defendants to immediately return and continue to provide any registrations, licenses, or forms required to make this preliminary injunction effective; and
- (4) grant such further and other relief as this Court deems just and proper.

Respectfully submitted,

/s/ Reid A. Jones

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*Counsel for Morris & Dickson Co., LLC*

**CERTIFICATE OF SERVICE**

I certify that on this 15<sup>th</sup> day of May, 2018, I have served a copy of the above and foregoing on all counsel of record through the Court's CM/ECF system.

s/ Reid A. Jones

Reid A. Jones